

**EXHIBIT "1"****Katherine McLaughlin**

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**From:** Wurm, William <WWurm@amundsendavislaw.com>  
**Sent:** Monday, August 28, 2023 4:42 PM  
**To:** Candace Woods  
**Cc:** Liam Brannon; Katherine McLaughlin; Jurgiel, Ryan; Woerndle, Sue Ann  
**Subject:** RE: Correspondence from Liam R. Brannon - Verification of Debt; Case No. 2322-CC00955

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All,

I have reviewed your letter dated August 25, 2023. Your demand for the alleged debt is harassing, actionable, and nonsensical. You state that this debt arises from a contract provision between my clients and Ms. Siegert, which states, "[i]n the event of litigation between the parties, the prevailing party shall recover, in addition to damages or equitable relief, the cost of litigation including reasonable attorney's fees." You acknowledge that the lawsuit is pending and do not identify any partial, complete, interlocutory, or final orders in that lawsuit, which identify the prevailing party. Thus, there can be no debt due and owing at this time.

Simply stated, you are attempting to collect a debt that does not exist and which you know does not exist.

**Therefore, if you do not acknowledge, by 5PM on Thursday, August 30, 2023, in writing, that you will cease a desist from all collection efforts or correspondence as to this alleged debt, and will not hold this alleged debt out to any third parties as a currently-valid debt, until the lawsuit is complete, my clients will pursue legal action against Ms. Siegert.**

I look forward to hearing from you.

Best,

Will

William R. Wurm

Partner

Mobile: (636) 439-9858

[wwurm@amundsendavislaw.com](mailto:wwurm@amundsendavislaw.com)

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**From:** Candace Woods <cwoods@jenkinskling.com>  
**Sent:** Friday, August 25, 2023 4:15 PM  
**To:** Wurm, William <WWurm@amundsendavislaw.com>  
**Cc:** Liam Brannon <lbrannon@jenkinskling.com>; Katherine McLaughlin <kmclaughlin@jenkinskling.com>  
**Subject:** Correspondence from Liam R. Brannon - Verification of Debt; Case No. 2322-CC00955

[EXTERNAL]

Counsel,

Attached please find correspondence from Liam R. Brannon.

Thank you,

Candace Woods  
Legal Assistant  
JENKINS & KLING, P.C.  
150 North Meramec Ave.  
Suite 400  
St. Louis, Missouri 63105  
(314) 561-5088 (direct)  
(314) 721-2525 (main)  
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